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**COUNTY OF INYO
WATER DEPARTMENT**

June 16, 2017

Ms. Heather Shannon
Division of Integrated Regional Water Management
DWR
PO Box 942836
Sacramento, CA 94326-0001

SUBJECT: Comments on "Proposal Solicitation Package for Groundwater Sustainability Plans and Projects, Draft, May 2017"

Dear Ms. Shannon:

The County of Inyo Water Department submits these comments on the "Proposal Solicitation Package for Groundwater Sustainability Plans and Projects, Draft, May 2017."

Page 7, II.A. Cost Share. What criteria will DWR use to evaluate whether a project provides benefits to a SDAC, DAC or an EDA?

Page 7, III.A. Eligible Applicant. If there are multiple GSAs in a basin and DWR receives multiple applications from GSAs in the same basin, will any of the applications be deemed eligible to compete for a grant, or will all of the applications be deemed ineligible?

Page 7, III.A. Eligible Applicant. This section indicates that applicants may be an eligible agency applying "on behalf of the basin." Please clarify that a GSA for a portion of a basin may apply on behalf of other GSAs in the basin.

Page 7, III.B. Eligible Project Types. The first sentence is unclear. Perhaps it should read "... must address the non-adjudicated portion of a medium or high priority basin or basins." Also, an important component of GSPs in basins that are partially adjudicated coordination between the adjudicated portion of the basin and the SGMA-managed portion of the basin. It should be made clear that developing a GSP in the non-adjudicated portion of the basin necessitates coordination with the adjudicated portion of the basin and that grant funds may be used for such. This will be a key consideration for GSPs in partially adjudicated basins, especially in basins where most of the groundwater pumping is in the adjudicated portion (a typical situation).

Page 7, III.B. Eligible Project Types. It is problematic to deem probationary basins entirely ineligible. It is our understanding of Water Code §10735.2(a) is that if a basin is designated probationary it is designated probationary in its entirety, regardless of the size of unmanaged areas or the progress toward SGMA compliance made elsewhere in the basin. It is understandable that DWR desires to eliminate unmanaged areas, but prospective applicants should not be deemed ineligible due to the action or inaction of entities outside of their control. For example, in a basin extending into multiple counties, a county with a relatively small portion of the basin may reasonably decide to opt out of their presumed role as GSA because the insignificant amount of pumping, population, and/or economic activity in their portion of the basin. Though opting out may be reasonable from that county's point of view, it would render GSAs in the rest of the basin, where the need for grant funding is much greater, ineligible for a Category 2 grant. This would unfairly penalize GSAs that are diligently trying to meet their SGMA responsibilities, and greatly undermine the ability of those GSAs to develop effective sustainability plans. This example is a real possibility in Owens Valley Groundwater Basin (6-012).

Page 9, IV. Solicitation Process and Schedule. There is a typo in Table 2 in the tentative dates for Phase 2 filing: "...January 2017" should be "...January 2018."

Page 12, Table 3, Grant Application Checklist, Questions Tab, Q4. The applicant may not be responsible for CASGEM compliance or be acting as CASGEM monitoring entity. Consider changing to "Is the basin CASGEM compliant? If not, is the applicant eligible to be a CASGEM reporting entity."

Thank you for considering these comments.